Section K

Facility Name: Atlantic State Cast Iron Pipe Co.
Program Interest Number: 85441
Permit Activity Number: BOP990001

INVENTORIES

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ATLANTIC STATES CAST IRON PIPE CO (85441)
BOP990001

Date:2/13/2003

New Jersey Department of Environmental Protection
Insignificant Source Emissions

IS NJID	Source/Group Description	Equipment Type	Location Description	Estimate of Emissions (tpy)								
				VOC (Total)	NOx	CO	SO	TSP	PM-10	Pb	HAPS (Total)	Other (Total)
IS1	Sand/Cement Mixer handling <50lb/hr of raw materials	Manufacturing and Materials Handling Equipment	Ref. ASCIP Dwg. No. V-11890	0.000	0.000	0.000	0.000	0.090	0.090	0.000	0.00000000	0.000
IS2	Sand Silo<2000 ft3 capacity storing solid particles	Manufacturing and Materials Handling Equipment	Ref. ASCIP Dwg. No. V-11890	0.000	0.000	0.000	0.000	0.085	0.085	0.000	0.00000000	0.000
IS3	Cement Silo<2000 ft3 capacity storing solid particles	Manufacturing and Materials Handling Equipment	Ref. ASCIP Dwg. No. V-11890	0.000	0.000	0.000	0.000	0.085	0.085	0.000	0.00000000	0.000
IS4	Lime Silo <2000 ft3 storing capacity storing solid particles.	Manufacturing and Materials Handling Equipment	Ref. ASCIP Dwg. No. V-11890	0.000	0.000	0.000	0.000	0.085	0.085	0.000	0.00000000	0.000
IS5	Mold Sand Blasting handling less than 50 lb/hr.	Dry Cleaning Equipment	Ref. ASCIP Dwg. No. V-11890	0.000	0.000	0.000	0.000	0.001	0.000	0.000	0.00000000	0.000
IS6	Lime Slag storage vessel <2000 cu.ft storing solid particles	Manufacturing and Materials Handling Equipment	Ref. ASCIP Dwg. No. V-11890	0.000	0.000	0.000	0.000	1.521	1.521	0.000	0.00000000	0.000
IS7	Cupola Slag Storage vessel <2000 cu.ft storing solid particles	Manufacturing and Materials Handling Equipment	Ref. ASCIP Dwg. No. V-11890	0.000	0.000	0.000	0.000	0.503	0.503	0.000	0.00000000	0.000
IS9	Cooling Towers handling < 50 lb/hr of water treatment chemical	Other Equipment	Ref. ASCIP Dwg. No. V-11890	0.000	0.000	0.000	0.000	7.772	0.077	0.000	0.00000000	0.000
IS10	Diesel Equipment < 1MMBTU/hour	Fuel Combustion Equipment (Other)	Ref. ASCIP Dwg. No. V-11890	1.050	14.700	3.160	0.940	1.050	1.050	0.000	0.00000000	0.000

ATLANTIC STATES CAST IRON PIPE CO (85441)
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New Jersey Department of Environmental Protection
Insignificant Source Emissions

IS NJID	Source/Group Description	Equipment Type	Location Description	Estimate of Emissions (tpy)								
				VOC (Total)	NOx	CO	SO	TSP	PM-10	Pb	HAPS (Total)	Other (Total)
IS11	Parts Cleaning - unheated open top surface cleaner < 6 ft2 opening with a capacity less than 100 gallons	Degreaser (Open Top: Unheated)	Ref. ASCIP Dwg. No. V-11890	0.990	0.000	0.000	0.000	0.000	0.000	0.000	0.00000000	0.000
IS12	Core Butts Storage Vessel < 200 cu. ft solid material	Storage Vessel										
IS14	Test Presses - handling <50 lb/hr of raw material	Other Equipment	Ref. ASCIP Dwg. No. V-11890	0.000	0.000	0.000	0.000	0.098	0.098	0.000	0.00000000	0.000
IS16	Space Heaters- less than 1MMBTU/hr	Fuel Combustion Equipment (Other)	Ref. ASCIP Dwg. No. V-11890	0.140	337.000	0.840	0.010	0.150	0.150	0.000	0.00000000	0.000
IS17	Blacking Tanks - less than 2000 gallons capacity	Other Equipment	Ref. ASCIP Dwg. No. V-11890	0.000	0.000	0.000	0.000	0.004	0.004	0.000	0.00000000	0.000
IS18	Welding Machines < 12 lb/day of welding rod use	Other Equipment	Ref. ASCIP Dwg. No. V-11890	0.000	0.000	0.000	0.000	0.037	0.037	0.000	0.00000000	0.000
IS19	Storage vessel - storing Mineral spirits less than 2000 gallon capacity	Storage Vessel	Ref. ASCIP Dwg. No. V-11890	0.020	0.000	0.000	0.000	0.000	0.000	0.000	0.00000000	0.000
IS20	Storage vessel - storing Petroleum Oil with a tank capacity <10,000 gallons	Storage Vessel	Ref. ASCIP Dwg. No. V-11890	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.00000000	0.000
IS21	Mold Welding < 50 lb/hr of raw material handling	Other Equipment	Ref. ASCIP Dwg. No. V-11890	0.000	0.000	0.000	0.000	0.092	0.092	0.000	0.00000000	0.000
Total				2.201	351.700	4.000	0.950	11.960	4.264	0.000	0.00000000	0.000

ATLANTIC STATES CAST IRON PIPE CO (85441)
BOP990001

Date: 02/19/2003

New Jersey Department of Environmental Protection
Non-Source Fugitive Emissions

FG NJID	Description of Activity Causing Emission	Location Description	Reasonable Estimate of Emissions (tpy)								
			VOC (Total)	NOx	CO	SO	TSP (Total)	PM-10	Pb	HAPS (Total)	Other (Total)
FG1	Paved Roads	Throughout Plant Area	0.000	0.000	0.000	0.000	6.650	1.300	0.000	0.00000000	0.000
FG2	Non Source Charge Handling	Melt Center	0.000	0.000	0.000	0.000	11.700	7.020	0.000	0.00000000	0.000
Total			0.000	0.000	0.000	0.000	18.350	8.320	0.000	0.00000000	0.000

ATLANTIC STATES CAST IRON PIPE CO (85441)
BOP990001

Date: 2/13/2003

New Jersey Department of Environmental Protection
Equipment Inventory

Equip. NJID	Facility's Designation	Equipment Description	Equipment Type	Certificate Number	Install Date	Grand-Fathered	Last Mod. (Since 1968)	Equip. Set ID
E1	Cupola	Cupola	Other Equipment	PCP020001	1/1/1986	No	12/24/1998	
E2	Launder	Launder	Other Equipment	PCP010003	1/31/1993	No	4/29/1998	
E3	Desulfur	Desulfur Ladle	Other Equipment	PCP010003	1/31/1993	No	4/29/1998	
E4	Bull Ladle	Forehearth	Other Equipment	PCP010003	1/31/1993	No	4/29/1998	
E5	Transfer	Inoculation Ladle	Other Equipment	PCP010003	1/31/1993	No	4/29/1998	
E6	Cast No. 1	Casting Machine	Manufacturing and Materials Handling Equipment	PCP010003	1/31/1993	No	4/29/1998	
E7	Cast No. 2	Casting Machine	Manufacturing and Materials Handling Equipment	PCP010003	1/31/1993	No	4/29/1998	
E8	Cast No. 3	Casting Machine	Manufacturing and Materials Handling Equipment	PCP010003	1/31/1993	No	4/29/1998	
E9	Cast No. 4	Casting Machine	Manufacturing and Materials Handling Equipment	PCP010003	1/31/1993	No	4/29/1998	
E10	Cast No. 5	Casting Machine	Manufacturing and Materials Handling Equipment	PCP010003	1/31/1993	No	4/29/1998	
E11	Cast No. 6	Casting Machine	Manufacturing and Materials Handling Equipment	PCP010003	1/31/1993	No	4/29/1998	
E12	Core No. 1	Core Molding Machine	Manufacturing and Materials Handling Equipment	PCP960009	8/11/1988	No	8/11/1988	

ATLANTIC STATES CAST IRON PIPE CO (85441) Date: 2/13/2003
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New Jersey Department of Environmental Protection
Equipment Inventory

Equip. NJID	Facility's Designation	Equipment Description	Equipment Type	Certificate Number	Install Date	Grand-Fathered	Last Mod. (Since 1968)	Equip. Set ID
E13	Core No. 2	Core Molding Machine	Manufacturing and Materials Handling Equipment	PCP960009	8/11/1988	No	8/11/1988	
E14	Core No. 3	Core Molding Machine	Manufacturing and Materials Handling Equipment	PCP960009	8/11/1988	No	8/11/1988	
E15	Core No. 4	Core Molding Machine	Manufacturing and Materials Handling Equipment	PCP960009	8/11/1988	No	8/11/1988	
E16	Core No. 5	Core Molding Machine	Manufacturing and Materials Handling Equipment	PCP960009	8/11/1988	No	8/11/1988	
E17	Core No. 6	Core Molding Machine	Manufacturing and Materials Handling Equipment	PCP960009	8/11/1988	No	8/11/1988	
E18	Core No. 7	Core Molding Machine	Manufacturing and Materials Handling Equipment	PCP960009	8/11/1988	No	8/11/1988	
E19	Core No. 8	Core Molding Machine	Manufacturing and Materials Handling Equipment	PCP960009	8/11/1988	No	8/11/1988	
E20			Surface Coating Equipment (Non-Fabric Material)			No		
E21	Reamer	Pipe Reamer	Manufacturing and Materials Handling Equipment	PCP010002	11/13/1996	No	3/31/2000	
E23	Annealing	Annealing Oven	Fuel Combustion Equipment (Other)	940154	11/22/1994	No	8/31/1999	
E24	Bell Grinder	Grinding bell of pipe	Other Equipment	PCP010002				

ATLANTIC STATES CAST IRON PIPE CO (85441)
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Date: 2/13/2003

New Jersey Department of Environmental Protection
Equipment Inventory

Equip. NJID	Facility's Designation	Equipment Description	Equipment Type	Certificate Number	Install Date	Grand-Fathered	Last Mod. (Since 1968)	Equip. Set ID
E25	Cast No. 7	Casting Machine	Manufacturing and Materials Handling Equipment	PCP1980482	5/31/2001	No	5/31/2001	

ATLANTIC STATES CAST IRON PIPE CO (85441)
BOP990001

Date: 2/13/2003

New Jersey Department of Environmental Protection
Control Device Inventory

CD NJID	Facility's Designation	Description	CD Type	Install Date	Grand-Fathered	Last Mod. (Since 1968)	CD Set ID
CD1	Cupola Scrub	Cupola Scrubber Stack	Scrubber (Venturi)	1/1/1986	No	1/1/1986	CS119004
CD2	Cyclone	Mist Eliminator	Cyclone	1/1/1986	No	1/1/1986	CS119004
CD3	Afterburner	Cupola Afterburner	Other	1/1/1986	No	1/1/1986	CS119004
CD4	Melt Bghs	Melt Center Baghouse	Particulate Filter (Baghouse)	1/31/1993	No	1/1/1993	CS118087
CD5	Core Bghs	Core Machine Baghouse	Particulate Filter (Baghouse)	8/11/1988	No	8/11/1988	CS85853
CD6	Finish Bghs	Finishing Baghouse	Particulate Filter (Baghouse)	11/13/1996	No	3/31/2000	CS963313

85441 ATLANTIC STATES CAST IRON PIPE CO BOP990001 CD1 (Scrubber (Venturi))
Print Date: 2/19/03

Make:	Venturi
Manufacturer:	Barefoot
Model:	n/a
Is the Scrubber used for Particulate Control?	yes
Is the Scrubber used for Gas Control?	yes
Is the Scrubber Equipped with a Mist Eliminator?	yes
Minimum Pump Discharge Pressure (in. H2O):	970
Maximum Pump Discharge Pressure (in. H2O):	1660
Method of Monitoring Pump Discharge Pressure:	guage
Minimum Pump Current (amps):	n/a
Maximum Pump Current (amps):	n/a
Method of Monitoring Pump Current:	n/a
Minimum Scrubber Medium Inlet Pressure (in. H2O):	970
Minimum Operating Liquid Flow Rate (gpm):	325
Maximum Operating Liquid Flow Rate (gpm):	500
Method of Monitoring Liquid Flow Rate:	guage
Minimum Operating Gas Flow Rate (acfm):	50000
Maximum Operating Gas Flow Rate (acfm):	70000
Method of Monitoring Gas Flow Rate:	test
Minimum Operating Pressure Drop (in. H2O):	40

Maximum Operating Pressure Drop (in. H2O):	60
Method of Monitoring Pressure Drop:	guage
Throat Length (in):	4
Throat Diameter (in):	21.4
Liquid Introduction Mechanism:	pump
Type of Nozzle:	nipple
Maximum Inlet Gas Temperature (deg F):	1200
Maximum Outlet Gas Temperature (deg F):	195
Inlet Particle Grain Loading (gr/dscf):	n/a
Maximum Number of Sources Using this Apparatus as a Control Device (Include Permitted and Non-permitted Sources):	1
Alternative Method to Demonstrate Control Apparatus is Operating Properly:	n/a
Have you attached data from recent performance testing?	yes
Have you attached any manufacturer's data or specifications in support of the feasibility and/or effectiveness of this control apparatus?	no
Have you attached a diagram showing the location and/or configuration of this control apparatus?	yes
Comments:	none

Control Device Design Efficiency Table

Pollutant Category	Design Efficiency (%)
PM-10	
TSP	
VOC	
NOx	
SO2	
CO	
Pb	
HAPs (Total)	
Other (Total)	
Individual HAPs/Other (speciate below)	

85441 ATLANTIC STATES CAST IRON PIPE CO BOP990001 CD2 (Cyclone)
Print Date: 2/19/03

Make:	
Manufacturer:	
Model:	
Unit Type:	
Description:	Core Sand Vacumm single cylcone
Major Cylinder Diameter, Dc (ft):	6
Major Cylinder Length, Lc (ft):	3.5
Gas Outlet Diameter, De (ft):	2.5
Gas Inlet Height, He (ft):	2
Gas Inlet Width, Bc (ft):	1
Gas Outlet Length, Hc + Sc [usually 5/8 Dc] (ft):	4.25
Cone Length, Zc (ft):	5
Dust Outlet, Jc (ft):	6
Effective Number of Turns, Ne:	2.5
Inlet Gas Velocity, Vi (ft/min):	1650
True Particle Density (lbs/ft3):	100
Average Particle Size (Micrometers):	105Micron
Gas Temperature (deg F):	Ambient
Have You Attached a Particle Size Distribution Analysis?	
Maximum Number of Sources Using this Apparatus as a Control Device (Include Permitted and Non-permitted Sources):	

Alternative Method to Demonstrate Control Apparatus is Operating Properly:	
Have you attached data from recent performance testing?	
Have you attached any manufacturer's data or specifications in support of the feasibility and/or effectiveness of this control apparatus?	
Have you attached a diagram showing the location and/or configuration of this control apparatus?	
Comments:	

Control Device Design Efficiency Table

Pollutant Category	Design Efficiency (%)
PM-10	
TSP	
VOC	
NOx	
SO2	
CO	
Pb	
HAPs (Total)	
Other (Total)	
Individual HAPs/Other (speciate below)	

85441 ATLANTIC STATES CAST IRON PIPE CO BOP990001 CD3 (Oxidizer (Thermal))
Print Date: 2/19/03

Make:	North American
Manufacturer:	North American
Model:	Hiram
Minimum Chamber Temperature (deg F):	1600
Minimum Residence Time (sec):	0.5
Fuel Type:	natural gas
Maximum Rated Gross Heat Input (MMBtu/hr):	16.0MM
Maximum Number of Sources Using this Apparatus as a Control Device (Include Permitted and Non-permitted Sources):	1
Alternative Method to Demonstrate Control Apparatus is Operating Properly:	CO,O2, and temp monitors
Have you attached data from recent performance testing?	
Have you attached any manufacturer's data or specifications in support of the feasibility and/or effectiveness of this control apparatus?	
Have you attached a diagram showing the location and/or configuration of this control apparatus?	
Comments:	

Control Device Design Efficiency Table

Pollutant Category	Design Efficiency (%)
PM-10	
TSP	
VOC	98
NOx	
SO2	
CO	
Pb	
HAPs (Total)	
Other (Total)	
Individual HAPs/Other (speciate below)	

85441 ATLANTIC STATES CAST IRON PIPE CO BOP990001 CD4 (Particulate Filter (Baghouse))
Print Date: 2/19/03

Make:	AIRTROL
Manufacturer:	AIRTROL
Model:	532AW12
Number of Bags:	2128
Size of Bags (ft2):	18.85
Total Bag Area (ft2):	40000
Bag Fabric:	Polyester
Fabric Weight (oz/ft):	16
Fabric Weave:	Felted
Fabric Finish:	Plain
Maximum Design Temperature Capability (deg F):	275
Maximum Design Air Flow Rate (acfm):	150000
Draft Type:	Exhaust
Maximum Air Flow Rate to Cloth Area Ratio:	3.7
Minimum Operating Pressure Drop (in. H2O):	2
Maximum Operating Pressure Drop (in. H2O):	6
Method of Monitoring Pressure Drop:	Differential Pressure Guage
Maximum Inlet Temperature (deg F):	175
Minimum Inlet Temperature (deg F):	100
Dew Point of Gas Stream (deg F):	N/A
Maximum Operating Exhaust Gas Flow Rate (acfm):	150000
Maximum Inlet Gas Stream Moisture Content (%):	N/A

Method for Determining When Bag Replacement is Required:	Inspection/Schedule
Method for Determining When Cleaning is Required:	Automatic
Method of Bag Cleaning:	Pulse Jet
Is Bag Cleaning Conducted On-Line?	No
Maximum Number of Sources Using this Apparatus as a Control Device (Include Permitted and Non-permitted Sources):	12
Alternative Method to Demonstrate Control Apparatus is Operating Properly:	Stack Test
Have you attached a Particle Size Distribution Analysis?	NO
Have you attached data from recent performance testing?	No
Have you attached any manufacturer's data or specifications in support of the feasibility and/or effectiveness of this control apparatus?	No
Have you attached a diagram showing the location and/or configuration of this control apparatus?	
Comments:	

Control Device Design Efficiency Table

Pollutant Category	Design Efficiency (%)
PM-10	99
TSP	99
VOC	
NOx	
SO2	
CO	
Pb	
HAPs (Total)	
Other (Total)	
Individual HAPs/Other (speciate below)	

85441 ATLANTIC STATES CAST IRON PIPE CO BOP990001 CD5 (Particulate Filter (Baghouse))
Print Date: 2/19/03

Make:	
Manufacturer:	Wheelibrator
Model:	Ultra Jet No. 108
Number of Bags:	180
Size of Bags (ft2):	5" x 168"
Total Bag Area (ft2):	2520
Bag Fabric:	Polyester
Fabric Weight (oz/ft):	14 - 16
Fabric Weave:	Felted
Fabric Finish:	Standard
Maximum Design Temperature Capability (deg F):	180
Maximum Design Air Flow Rate (acfm):	20400
Draft Type:	
Maximum Air Flow Rate to Cloth Area Ratio:	8:01
Minimum Operating Pressure Drop (in. H2O):	1
Maximum Operating Pressure Drop (in. H2O):	6
Method of Monitoring Pressure Drop:	
Maximum Inlet Temperature (deg F):	
Minimum Inlet Temperature (deg F):	
Dew Point of Gas Stream (deg F):	
Maximum Operating Exhaust Gas Flow Rate (acfm):	20400
Maximum Inlet Gas Stream Moisture Content (%):	

Method for Determining When Bag Replacement is Required:	Visual inspection daily
Method for Determining When Cleaning is Required:	Operation checked daily and recorded
Method of Bag Cleaning:	
Is Bag Cleaning Conducted On-Line?	
Maximum Number of Sources Using this Apparatus as a Control Device (Include Permitted and Non-permitted Sources):	8
Alternative Method to Demonstrate Control Apparatus is Operating Properly:	
Have you attached a Particle Size Distribution Analysis?	
Have you attached data from recent performance testing?	
Have you attached any manufacturer's data or specifications in support of the feasibility and/or effectiveness of this control apparatus?	
Have you attached a diagram showing the location and/or configuration of this control apparatus?	
Comments:	

Control Device Design Efficiency Table

Pollutant Category	Design Efficiency (%)
PM-10	99
TSP	99
VOC	
NOx	
SO2	
CO	
Pb	
HAPs (Total)	
Other (Total)	
Individual HAPs/Other (speciate below)	

85441 ATLANTIC STATES CAST IRON PIPE CO BOP990001 CD6 (Particulate Filter (Baghouse))
Print Date: 2/19/03

Make:	
Manufacturer:	COX
Model:	24000
Number of Bags:	480
Size of Bags (ft2):	5" Dia X 132" Lg
Total Bag Area (ft2):	2200
Bag Fabric:	Cotton
Fabric Weight (oz/ft):	6.75
Fabric Weave:	Twill
Fabric Finish:	STD
Maximum Design Temperature Capability (deg F):	Ambient
Maximum Design Air Flow Rate (acfm):	24000
Draft Type:	
Maximum Air Flow Rate to Cloth Area Ratio:	2.5:1
Minimum Operating Pressure Drop (in. H2O):	2
Maximum Operating Pressure Drop (in. H2O):	6
Method of Monitoring Pressure Drop:	Physical inspection daily
Maximum Inlet Temperature (deg F):	
Minimum Inlet Temperature (deg F):	Ambient
Dew Point of Gas Stream (deg F):	
Maximum Operating Exhaust Gas Flow Rate (acfm):	13200
Maximum Inlet Gas Stream Moisture Content (%):	

Method for Determining When Bag Replacement is Required:	
Method for Determining When Cleaning is Required:	Physical Inspection daily.
Method of Bag Cleaning:	Mechanical shaking
Is Bag Cleaning Conducted On-Line?	
Maximum Number of Sources Using this Apparatus as a Control Device (Include Permitted and Non-permitted Sources):	4
Alternative Method to Demonstrate Control Apparatus is Operating Properly:	
Have you attached a Particle Size Distribution Analysis?	
Have you attached data from recent performance testing?	
Have you attached any manufacturer's data or specifications in support of the feasibility and/or effectiveness of this control apparatus?	
Have you attached a diagram showing the location and/or configuration of this control apparatus?	
Comments:	

Control Device Design Efficiency Table

Pollutant Category	Design Efficiency (%)
PM-10	99
TSP	99
VOC	
NOx	
SO2	
CO	
Pb	
HAPs (Total)	
Other (Total)	
Individual HAPs/Other (speciate below)	

ATLANTIC STATES CAST IRON PIPE CO (85441)
BOP990001

Date: 2/13/2003

New Jersey Department of Environmental Protection
Emission Points Inventory

PT NJID	Facility's Designation	Description	Config.	Equiv. Diam. (in.)	Height (ft.)	Dist. to Prop. Line (ft)	Exhaust Temp. (deg. F)			Exhaust Vol. (acfm)			Discharge Direction	PT Set ID
							Avg.	Min.	Max.	Avg.	Min.	Max.		
PT1	Scrubber	Cupola Scrubber Stack	Round	60	150	50	172.0	150.0	195.0	60,000.0	50,000.0	70,000.0	Up	PS 1
PT2	Core Bghs	Core Mechine Baghouse Stack	Round	33	76	65	80.0	50.0	110.0	20,000.0	15,000.0	25,000.0	Up	PS 2
PT3	Melt Bghs	Melt Center Emission Control Stack	Round	96	150	70	125.0	90.0	160.0	157,000.0	140,000.0	175,000.0	Up	PS 3
PT4	Annealing	Annealing Oven	Rectangle	30	20	100	1,400.0	1,000.0	1,800.0	3,000.0	2,000.0	4,000.0	Up	PS 4
PT6	Finish Bghs	Finishing Baghouse	Rectangle	34	12	140	70.0	40.0	100.0	9,000.0	6,000.0	13,000.0	Up	PS 6

ATLANTIC STATES CAST IRON PIPE CO (85441)
BOP990001

Date: 2/13/03

New Jersey Department of Environmental Protection
Emission Unit/Batch Process Inventory

U 1 Scrubber Scrubber system controlling emissions from foundry cupola

UOS NJID	Facility's Designation	UOS Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Annual Oper. Hours		VOC Range	Flow (acfm)		Temp. (deg F)	
								Min.	Max.		Min.	Max.	Min.	Max.
OS1	Cupola	Cupola burning coke/auxiliary fuels	Normal - Steady State	E1	CD1 (S) CD2 (T) CD3 (P)	PT1	3-04	1,200.0	3,600.0	A	50,000.0	70,000.0	150.0	195.0

U 2 Core Bghs Core machines molding sand cores

UOS NJID	Facility's Designation	UOS Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Annual Oper. Hours		VOC Range	Flow (acfm)		Temp. (deg F)	
								Min.	Max.		Min.	Max.	Min.	Max.
OS1	Core No. 1	Core Molding Machine No. 1	Normal - Steady State	E12	CD5 (P)	PT3	3-04	1,600.0	3,600.0	A	15,000.0	25,000.0	40.0	100.0
OS2	Core No. 2	Core Molding Machine No. 2	Normal - Steady State	E13	CD5 (P)	PT3	3-04	1,600.0	3,600.0	A	15,000.0	25,000.0	40.0	100.0
OS3	Core No. 3	Core Molding Machine No. 3	Normal - Steady State	E14	CD5 (P)	PT3	3-04	1,600.0	3,600.0	A	15,000.0	25,000.0	40.0	100.0
OS4	Core No. 4	Core Molding Machine No. 4	Normal - Steady State	E15	CD5 (P)	PT3	3-04	1,600.0	3,600.0	A	15,000.0	25,000.0	40.0	100.0
OS5	Core No. 5	Core Molding Machine No. 5	Normal - Steady State	E16	CD5 (P)	PT3	3-04	1,600.0	3,600.0	A	15,000.0	25,000.0	40.0	100.0
OS6	Core No. 6	Core Molding Machine No. 6	Normal - Steady State	E17	CD5 (P)	PT3	3-04	1,600.0	3,600.0	A	15,000.0	25,000.0	40.0	100.0
OS7	Core No. 7	Core Molding Machine No. 7	Normal - Steady State	E18	CD5 (P)	PT3	3-04	1,600.0	3,600.0	A	15,000.0	25,000.0	40.0	100.0

ATLANTIC STATES CAST IRON PIPE CO (85441)
BOP990001

Date: 2/13/03

New Jersey Department of Environmental Protection
Emission Unit/Batch Process Inventory

U 2 Core Bghs Core machines molding sand cores

UOS NJID	Facility's Designation	UOS Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Annual Oper. Hours Min.	Annual Oper. Hours Max.	VOC Range	Flow (acfm) Min.	Flow (acfm) Max.	Temp. (deg F) Min.	Temp. (deg F) Max.
OS8	Core No. 8	Core Molding Machine No. 8	Normal - Steady State	E19	CD5 (P)	PT3	3-04	1,600.0	3,600.0	A	15,000.0	25,000.0	40.0	100.0

U 3 Melt Bghs Melt Center Baghouse controlling launder & ladle emissions

UOS NJID	Facility's Designation	UOS Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Annual Oper. Hours Min.	Annual Oper. Hours Max.	VOC Range	Flow (acfm) Min.	Flow (acfm) Max.	Temp. (deg F) Min.	Temp. (deg F) Max.
OS1	Launder	Iron launder conveying molten iron to ladle	Normal - Steady State	E2	CD4 (P)	PT2	3-04	1,600.0	3,600.0	A	140,000.0	175,000.0	90.0	160.0
OS2	Desulfur	Desulfurizing Ladle	Normal - Steady State	E3	CD4 (P)	PT2	3-04	1,600.0	3,600.0	A	140,000.0	175,000.0	90.0	160.0
OS3	Bull Ladle	Forehearth holding ladle	Normal - Steady State	E4	CD4 (P)	PT2	3-04	1,600.0	3,600.0	A	140,000.0	175,000.0	90.0	160.0
OS4	Transfer	Innocualtion/Transfer ladle to Casting Machines	Normal - Steady State	E5	CD4 (P)	PT2	3-04	1,600.0	3,600.0	A	140,000.0	175,000.0	90.0	160.0
OS5	Cast No. 1	No. 1 Casting Machine	Normal - Steady State	E6	CD4 (P)	PT2	3-04	1,600.0	3,600.0	A	140,000.0	175,000.0	90.0	160.0
OS6	Cast No. 2	No. 2 Casting Machine	Normal - Steady State	E7	CD4 (P)	PT2	3-04	1,600.0	3,600.0	A	140,000.0	175,000.0	90.0	160.0
OS7	Cast No. 3	No. 3 Casting Machine	Normal - Steady State	E8	CD4 (P)	PT2	3-04	1,600.0	3,600.0	A	140,000.0	175,000.0	90.0	160.0
OS8	Cast No. 4	No. 4 Casting Machine	Normal - Steady State	E9	CD4 (P)	PT2	3-04	1,600.0	3,600.0	A	140,000.0	175,000.0	90.0	160.0
OS9	Cast No. 5	No. 5 Casting Machine	Normal - Steady State	E10	CD4 (P)	PT2	3-04	1,600.0	3,600.0	A	140,000.0	175,000.0	90.0	160.0
OS10	Cast No. 6	No. 6 Casting Machine	Normal - Steady State	E11	CD4 (P)	PT2	3-04	1,600.0	3,600.0	A	140,000.0	175,000.0	90.0	160.0

ATLANTIC STATES CAST IRON PIPE CO (85441)
BOP990001

Date: 2/13/03

New Jersey Department of Environmental Protection
Emission Unit/Batch Process Inventory

U 3 Melt Bghs Melt Center Baghouse controlling launder & ladle emissions

UOS NJID	Facility's Designation	UOS Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Annual Oper. Hours Min.	Annual Oper. Hours Max.	VOC Range	Flow (acfm) Min.	Flow (acfm) Max.	Temp. (deg F) Min.	Temp. (deg F) Max.
OS11	Cast No.7	No.7 Casting Machine	Normal - Steady State	E25				1,600.0	3,600.0	A	140,000.0	175,000.0	90.0	160.0

U 4 Annealing Annealing Oven for Cast Pipe

UOS NJID	Facility's Designation	UOS Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Annual Oper. Hours Min.	Annual Oper. Hours Max.	VOC Range	Flow (acfm) Min.	Flow (acfm) Max.	Temp. (deg F) Min.	Temp. (deg F) Max.
OS1	Annealing	Annealing Oven	Normal - Steady State	E23		PT4	A21-02-006	3,000.0	5,000.0	A	2,000.0	4,000.0	700.0	1,800.0

U 6 Finish Bghs Finishing Baghouse - Cutting the pipe, grinding the bell and removal of sand

UOS NJID	Facility's Designation	UOS Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Annual Oper. Hours Min.	Annual Oper. Hours Max.	VOC Range	Flow (acfm) Min.	Flow (acfm) Max.	Temp. (deg F) Min.	Temp. (deg F) Max.
OS1	Reamer	Reamer- Reaming Interior of Rework Pipe	Standby	E21	CD6 (P)	PT6	3-12-999-99	200.0	1,200.0	A	6,000.0	13,000.0	40.0	100.0

ATLANTIC STATES CAST IRON PIPE CO (85441)
BOP990001

Date: 2/13/03

New Jersey Department of Environmental Protection
Emission Unit/Batch Process Inventory

U 6 Finish Bghs Finishing Baghouse - Cutting the pipe, grinding the bell and removal of sand

UOS NJID	Facility's Designation	UOS Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Annual Oper. Hours		VOC Range	Flow (acfm)		Temp. (deg F)	
								Min.	Max.		Min.	Max.	Min.	Max.
OS2	Bell Grinder	Bell Grinder - grinding the bell of the pipe	Normal - Steady State	E24					5,400.0			3,300.0		70.0

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ANNUAL COMPLIANCE CERTIFICATION STATEMENT

Facility Name Atlantic State Cast Iron Pipe Mfg. Co. Program IntereNo. 85441

Please check (√) all that apply and provide information, where required, concerning your facility's compliance status.

☐ Pursuant to N.J.A.C. 7:27-22.19(f)1i, I hereby state that this facility is in compliance with all applicable requirements as indicated in the compliance plan of my operating permit.

☐ Pursuant to N.J.A.C. 7:27-22.19(f)1ii, I hereby state that this facility is in compliance with all applicable requirements as indicated in the compliance plan of my operating permit except for those applicable requirements listed in the compliance schedule, included in my operating permit pursuant to N.J.A.C. 7:27-22.9(c)5ii, which includes a sequence of actions with milestones leading to compliance with the applicable requirement. This facility is in compliance with all compliance schedules included in my operating permit.

☐ Pursuant to N.J.A.C. 7:27-22.19(f)1iii, I hereby state that this facility is in compliance with all applicable requirements as indicated in the compliance plan of my operating permit except for those applicable requirements included in an order or consent decree not incorporated into a compliance schedule.

☐ Pursuant to N.J.A.C. 7:27-22.19(f)1iv, I hereby state that this facility is in compliance with the applicable requirements indicated in the compliance plan and compliance schedules of my operating permit except those listed in the attachment.

The signature below must be made by a responsible official, as defined at N.J.A.C. 7:27-1.4.

Pursuant to N.J.A.C. 7:27-1.39(a)2: "I certify, under penalty of law, that I have personally examined and am familiar with the information submitted in this document and all attached documents and, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant civil and criminal penalties, including the possibility of fine or imprisonment or both, for submitting false, inaccurate or incomplete information."

NAME (PRINT or TYPE) _____ TITLE _____

SIGNATURE _____ DATE _____

The signature below must be made by the individual or individuals (may include consultants) with direct knowledge of and responsibility for the information contained with this document.

Pursuant to N.J.A.C. 7:27-1.39(a)1: "I certify, under penalty of law, that I believe the information provided in this document is true, accurate and complete. I am aware that there are significant civil and criminal penalties, including the possibility of fine or imprisonment or both, for submitting false, inaccurate or incomplete information."

NAME (PRINT or TYPE) _____ AFFILIATION - TITLE _____

SIGNATURE _____ DATE _____

Atlantic States
A DIVISION OF McWANE, INC.
AN ISO 9002 CERTIFIED COMPANY

183 Sitgreaves Street
Phillipsburg, NJ 08865
908-454-1161
FAX 908-213-0683

November 25, 2002

VIA TELEFAX AND OVERNIGHT MAIL
Thomas Micai, Chief
Bureau of Operating Permits
Air Quality Permitting Program
New Jersey Department of Environmental Protection
401 East State Street - 2nd Floor, P.O. Box 27
Trenton, NJ 08625-0027

Re: Atlantic States Cast Iron Pipe Co. ("ASCIP")
Comments on Draft Title V Permit

Dear Mr. Micai:

This letter serves to provide comments on ASCIP's draft Title V permit, provided to ASCIP by the New Jersey Department of Environmental Protection ("NJDEP") under cover letter dated October 10, 2002.

Section B – Reason for Permit

The Department states that "[t]his permit action consolidates previously approved permit terms and conditions into one single permit for the facility." ASCIP concurs that the purpose of the Title V permit is to consolidate its Subchapter 8 (N.J.A.C. 7:27-8 et seq.) requirements into one permit. However, as noted in comments below, the Department has exceeded this stated purpose, and its limited authority, of issuing a Title V permit which consolidates the Subchapter 8 conditions and requirements. There are numerous conditions and requirements which go beyond those contained in ASCIP's current Subchapter 8 permits. Accordingly, ASCIP hereby objects, and requests that the Department remove all such language and/or conditions.

Section C – Pollutant Emission Summary

ASCIP's understanding is that the summary chart is solely intended for purposes of public notice, and does not relate to any specific permit condition or requirement.

Section J – Facility Specific Requirements

Subject Item FC:

Ref #4, Page 2: This condition should be eliminated. N.J.A.C. 7:27-12 *et seq.*, including N.J.A.C. 7:27-12.4 (Tables I, II and III) are inapplicable to ASCIP. Further, ASCIP has never been requested, in writing or otherwise, by the Department to prepare a standby plan.

Subject Item E20:

Ref #1, Page 5: This condition should be modified or eliminated. The NJDEP has agreed to temporarily stay submission of the referenced permit application pending discussions and resolution as to whether such application is required under N.J.A.C. 7:27-8. Those discussions are ongoing, as confirmed in written communications between ASCIP and the Department.

Regulation of "Insignificant Sources":

The Department has proposed extensive conditions covering insignificant sources at ASCIP's facility. There is no appropriate regulatory basis or authority for such regulations, particularly to the extent that such requirements go beyond ASCIP's Subchapter 8 permit requirements. Further comments related to these conditions are identified below.

Subject Item IS8 Scrubber water Storage tank <2000 gal capacity:

Ref #1, Page 13: ASCIP does not believe the Department has authority to require this condition. The referenced condition also goes beyond ASCIP's Subchapter 8 permit and

thus is not authorized under Title V. Among other things, the NJDEP's reference to N.J.A.C. 7:27-22.16(a) does not grant the requisite authority to the Department. Subchapter 22.16(a) states that "[t]he Department will include in each operating permit, drafted for, or issued to, a facility, emission limitations and standards, including any operational requirements necessary to assure compliance with all applicable requirements which apply to a source operation or a group of source operations or to the facility as a whole at the time of permit issuance." The intent of this provision is to serve as general guidance to the Department to ensure that emission limits and standards – to the extent applicable and already part of the administrative rules – are included in the permit; it is not general authority for the Department to set new standards which are not contained in other sections of the rules or the facility's permit. Otherwise, the Department would violate basic principles of due process and administrative rule making. As such, the referenced condition should be eliminated from the draft permit.

Subject Item IS10 Diesel Equipment <1MMBTU/hour:

Ref #2, Page 15: This condition is inconsistent with N.J.A.C. 7:27-9.2(b) and it is unclear what the Department is requesting, including reference to "<=0.2% by weight.". N.J.A.C. 7:27-9.2(b) applies to specified categories based on grades of fuel oil; the regulation is clear on its face and should, at most, be simply referenced in the Title V permit, to the extent applicable. Moreover, the referenced monitoring and record keeping requirements should be eliminated. Among other things, there is no legal or reasonable basis to require a "certificate of analysis". Such a requirement exceeds the Department's authority pursuant to N.J.A.C. 7:27-22.16(o); such a requirement would also go beyond ASCIP's Subchapter 8 permit, and thus not authorized in this Title V permit.

ASCIP also should not be subject to any specific monitoring or record keeping requirements even if the referenced condition were applicable. Consistent with the Title V regulatory scheme, ASCIP should have the exclusive right and flexibility to maintain records

in a form that best suits its operations, consistent with best management practices. Nevertheless, ASCIP would be agreeable to the language referenced in Subject Item U1 (Ref #40, Page 36) which provides that: "All records required to be kept as part of this Permit shall be entered in a permanently bound log book, or in readily accessible computer memories, or by a method acceptable to the Regional Enforcement Office, maintained on site for a minimum of five years after collection and shall be made available to representative[s] of the Department upon request."

Subject Item IS11 Parts Cleaning – unheated open top surface cleaner <6 ft2 with a capacity less than 100 gallons:

Ref #1, 5 and 6 (Pages 16 and 17): ASCIP requests that all specific monitoring and record keeping requirements be eliminated. Consistent with the Title V regulatory scheme, ASCIP should have the exclusive right and flexibility to maintain records in a form that best suits its operations, consistent with best management practices. Nevertheless, ASCIP is agreeable to the language referenced in Subject Item U1 (Ref #40, Page 36) which provides that: "All records required to be kept as part of this Permit shall be entered in a permanently bound log book, or in readily accessible computer memories, or by a method acceptable to the Regional Enforcement Office, maintained on site for a minimum of five years after collection and shall be made available to representative[s] of the Department upon request."

Ref #5, Page 16: The monitoring and record keeping requirements are unreasonable, arbitrary and capricious; these requirements would also impose undue and unnecessary hardship on ASCIP to maintain and develop such information.

Ref #6, Page 16: This condition should be eliminated. N.J.A.C. 7:27-16(a), consistent with ASCIP's previous comments above, does not authorize any such specific, substantive requirement. There is also no legal or reasonable basis for this condition. The condition is unreasonable, arbitrary and capricious.

Subject Item IS16 Space Heaters – less than 1MMBTU/hr:

Ref #2, Page 18: There is no legal or reasonable basis to require a "certificate of analysis." Such a requirement exceeds the NJDEP's authority under N.J.A.C. 7:27-22.16(o); such a requirement would also go beyond ASCIP's Subchapter 8 permit, and thus not authorized in this Title V permit. Further, consistent with the Title V regulatory scheme, ASCIP should have the exclusive right and flexibility to maintain records in a form that best suits its operations, consistent with best management practices. Nevertheless, ASCIP would be agreeable to the language referenced in Subject Item U1 (Ref #40, Page 36) which provides that: "All records required to be kept as part of this Permit shall be entered in a permanently bound log book, or in readily accessible computer memories, or by a method acceptable to the Regional Enforcement Office, maintained on site for a minimum of five years after collection and shall be made available to representative[s] of the Department upon request."

Subject Item IS17 Blacking Tanks – less than 2000 gallons capacity:

Ref #1, 2, 3, 4, 5, 6, 7 and 8; Pages 19 and 20: For each of the listed conditions, the Department cites to N.J.A.C. 7:27-22.1 as the appropriate regulatory authority. However, Subchapter 22.1 is the "Definition" section of the operating permit rules and does not provide any such authority nor relate to the referenced provisions. Unless the Department has specific authority under the rules, these conditions should be eliminated.

Ref #8, Page 20: This condition directs that the owner or operator must have readily available – presumably at all times – a certified statement specifying the contents of the tank, affirming that the tank meets various applicable requirements and attesting that the tank is in compliance "with all other applicable State or federal air pollution requirements." As drafted by the Department, it would appear impossible to comply with this condition; in particular, it would be arbitrary, capricious and unreasonable to expect a permittee to maintain a current statement – at all times and in written form – which certifies to the current compliance status of the tanks at issue. This condition should be eliminated.

Subject Item IS18 Welding Machines <12 lb/day of welding rod use:

Ref #2, Page 21: This condition seeks to regulate the use of welding rods or wires, citing to N.J.A.C. 7:27-22.1 as the appropriate regulatory authority. Subchapter 22.1, however, relates solely to "definitions" and is inapplicable. As such, unless there is appropriate regulatory authority, this condition should be removed.

Subject Item IS19 Storage Vessel – storing Mineral spirits less than 2000 gallon capacity:

Ref #1, 2, 3, 4, 5, 6, 7, 8 and 9, Pages 22 and 23: Similar to comments above, all of the referenced conditions cite to N.J.A.C. 7:27-22.1 (operating permit "definition" section), which does not provide appropriate authority for such conditions.

Subject Item IS20 Storage Vessel – storing Petroleum Oil with a tank capacity <10,000 gallons:

Ref #1, Page 24: The monitoring requirements related to sulfur content in fuel is arbitrary, capricious and unreasonable. Moreover, it is excessive and beyond the Department's regulatory authority, as the referenced condition seeks to impose an undue burden on ASCIP to monitor each and every fuel delivery, including verifying fuel oil sulfur content on invoices and bills of lading. Such conditions also improperly exceed ASCIP's Subchapter 8 permit. Finally, the Department's cite to N.J.A.C. 7:27-22.16(o) does not provide proper authority for this condition.

Ref #2, 3, 4, 5, 6, 7, 8 and 9, Pages 24 and 25: The Department improperly cites to N.J.A.C. 7:27-22.1 (definition section) as authority for the referenced conditions. The Department must either identify appropriate regulatory authority, or eliminate these conditions.

Subject Item PT1 Cupola Scrubber Stack:

Ref #1, Page 27: (1) Efficiency testing on an above charge take off cupola is not feasible, and thus is arbitrary, capricious and unreasonable. (2) The Department requires stack emission testing based on "any sixty minute" period. However, the Department references N.J.A.C. 7:27-22.16(a), which does not provide any such authority for this condition. Moreover, this testing method is in conflict with mercury testing identified in Ref #2, Page 28 ("average of three runs"). (3) The Department requires that stack test result be submitted "within 45 days" after completing the stack test. However, past experience indicates that ASCIP will need at least 60 days to submit the results, and thus this condition should be modified. (4) The Department requires that when performing the stack emission test, the source must operate within +/- 5% of maximum load. As an initial matter, there is no such authority under the referenced cite to N.J.A.C. 7:27-16(a). This requirement also improperly exceeds ASCIP's Subchapter 8 permit. Notwithstanding, ASCIP would be agreeable to accept as part of its stack emission testing requirements, that the source operate within +/- 10% of maximum load. (5) There is no appropriate authority or reasonable basis to require ASCIP to test for benzene and/or polycyclic organic matter. Prior testing has shown they are either "non-detect" or in such low concentrations that it is not subject to regulation, and thus they have never been regulated as part of any permit condition. As such, this condition should be eliminated. (6) There is no appropriate regulatory authority or reasonable basis to require annual tests. Consistent with Department policy and other similar testing requirements, the test should be conducted once every five years.

Ref #2, Page 28: (1) There is no regulatory authority or reasonable basis to conduct mercury tests quarterly. The Department has requested annual testing for other metals; notwithstanding, ASCIP believes this permit condition should be modified to require mercury testing every five years, consistent with Department policy and other similar testing

requirements. Moreover, in ASCIP's most recent mercury test on March 12, 2002, results showed that all three runs were in compliance with mercury limits. (2) The referenced conditions exceed ASCIP's Subchapter 8 permits, and thus should be eliminated. (3) ASCIP also objects to the manner and extent to which the Department has attempted to regulate mercury in this and other conditions throughout the draft operating permit. Indeed, on January 3, 2002, the Department's Mercury Task Force released an Executive Summary and Recommendations report. The report recommended, among other things, that the Department should work, on a voluntary basis, with source operations and manufacturers to help reduce mercury in areas such as scrap metal from autos and appliances containing electrical switches, along with iron and steel smelters. The report admonished, however, that these mercury reduction recommendations were nothing more than a proposal for voluntary partnering with industry as an "interim measure until laws and regulations can be developed and implemented" related to the phase-out and/or removal of mercury in scrap, as well as regulatory development of better emission control technologies on iron and steel smelters if necessary. *See, e.g.,* NJDEP News Release "Report Outlines Impacts of Mercury in NJ and New Plan to Reduce Mercury in the Environment", dated January 3, 2002. Moreover, throughout the Mercury Task Force's report, it advises that measures to reduce mercury contamination in scrap or from industrial sources must be accomplished through a "cooperative process" given the lack of any laws or regulations in this area. Accordingly, while ASCIP is willing to work voluntarily and on a cooperative basis with the NJDEP on mercury related issues, conditions related to mercury regulation – unless specifically provided for by regulations – must be eliminated from ASCIP's draft Title V permit.

Subject Item PT3 melt Center Emission Control Stack:

Ref #1, Page 29: (1) The monitoring requirements require stack emission testing based on "any 60 minute period." ASCIP believes the stack test requirement should be based on the average of three runs. (2) The condition requiring submission of test results within 45 days

should be modified to 60 days, consistent with ASCIP's comments above. (3) The Department requires that when performing the stack emission test, the melt center must operate within +/- 5% of maximum load. As an initial matter, there is no such authority under the referenced cite to N.J.A.C. 7:27-16(a). This requirement also improperly exceeds ASCIP's Subchapter 8 permit. Notwithstanding, ASCIP would be agreeable to accept as part of its stack emission testing requirements, that the melt center operate within +/- 10% of maximum load.

Subject Item U1 Scrubber system controlling emissions from foundry cupola:

Ref #5, Page 31: This condition improperly limits ASCIP to 10% visible emissions. N.J.A.C. 7:27-22.16(e), which the Department cites as authority, does not impose any such limit. The Department has permitted ASCIP up to 20% opacity, consistent with other provisions contained in the draft permit. *See* Ref #2, Page 30. ASCIP concurs that the 20% opacity is the appropriate standard, consistent with N.J.A.C. 7:27-6.2(a). As such, the reference to 10% visible emissions should be eliminated and replaced with 20%.

ASCIP also believes that the monitoring and record keeping requirements are arbitrary, capricious and unreasonable. Consistent with the Title V regulatory scheme, ASCIP should have the exclusive right and flexibility to maintain records in a form that best suits its operations, consistent with best management practices. Nevertheless, ASCIP would be agreeable to the language referenced in Subject Item U1 (Ref #40, Page 36) which provides that: "All records required to be kept as part of this Permit shall be entered in a permanently bound log book, or in readily accessible computer memories, or by a method acceptable to the Regional Enforcement Office, maintained on site for a minimum of five years after collection and shall be made available to representative[s] of the Department upon request."

Ref #27, Page 33: ASCIP believes the Department has exceeded its authority related to regulation of mercury. Consistent with its comments above, ASCIP objects to the